



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Citgo Holdings Terminal, LLC, East Chicago, IN

FROM: Meaghan Pashen, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Citgo Holdings Terminal, LLC – East Chicago Terminal

Facility Location: 2500 East Chicago Avenue, East Chicago, IN 46312

Date of Inspection: August 2, 2022

EPA Inspector(s):

1. Meaghan Pashen, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees:

1. Maher Saad, Terminal Manager
2. Eric Rajski, Assistant Terminal Manager
3. Sasa Dunovic, IDEM Inspector

Contact Email Address: msaad@citgo.com

Purpose of Inspection: To determine facility compliance with the New Source Performance Standard (NSPS) Subpart Kb – Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (40 C.F.R. Part 60, Subpart Kb) with respect to petroleum product storage tanks.

Facility Type: Bulk petroleum product storage and transfer terminal

Regulations Central to Inspection: NSPS Subpart Kb – Standards of Performance for VOL Storage Vessels, including the obligation to perform preventative maintenance to ensure storage

tank control equipment performance, and to ensure storage tanks are equipped with a closed vent system designed to collect all VOL vapors and gases discharged from the storage tank.

Arrival Time: 1:00 PM

Departure Time: 2:45 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Maher Saad or Eric Rajski unless otherwise noted.

Process Description:

Citgo's East Chicago Terminal (the Facility) consists of 53 tanks to store various petroleum and related products, including: gasoline, gasoline blending agents, diesel, jet fuel, biodiesel, ethanol, butane, trans mix, and distillate products. Movement of product into and out of the Facility occurs primarily via bi-directional pipelines, except for distillate product which may be moved into and out of the Facility via trucks at a 2-bay loading rack. Gasoline storage tanks have fixed roofs and use internal floating roofs to control vapors.

Staff Interview: The terminal does not have a loading rack for gasoline. The loading rack for distillate has no vapor combustion unit (VCU) or vapor destruction unit (VDU) and associated emissions are vented to the atmosphere. Among the various tanks at the Facility, Tanks 7, 38, 39, and 43 contain gasoline. The design capacity of Tanks 7, 38, 39, and 43 is greater than 151 m³ for each tank, and each of the tanks are subject to requirements under NSPS Subpart Kb.

NSPS Subpart Kb requires the performance of preventative maintenance on storage tanks and associated control equipment. Facility staff performs monthly visual inspections of the tanks and roofs which consist of visual and odor checks. Facility staff did not indicate any instance of vent leaks identified during these inspections. Annual visual inspections are conducted on the secondary seals of each floating roof. Out of service seal inspections are conducted every 10 years and API-653 inspections are conducted concurrent with them. EPA requested these inspection reports and associated repair memos for Tanks 7, 38, 39, and 43.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed and recorded several videos indicating hydrocarbon emissions from vents located at the tops of Tanks 7, 38, 39, and 43 using a Forward Looking InfraRed (FLIR) camera. See Digital Image Log.

Photos and/or Videos: were taken during the inspection.

See Appendix A: Digital Image Log

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- For Tanks 7, 38, 39, and 43:
 - Last five annual visual inspection reports;
 - Last out-of-service inspection reports, including API reports; and
 - Associated repair memos for all inspections listed above.

Concerns: EPA informed facility staff that the emissions observed at Tanks 7, 38, 39, and 43 may need further investigation.

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____

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APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Digital Image Log

Facility Name: Citgo Holdings Terminal, LLC – East Chicago Terminal
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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Jason Schenandoah	2. Archival Record Location: R5 Electronic Records Center: Citgo East Chicago File
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	MOV_0452.mp4	August 2, 2022 9:35 am		Emissions from vents and top of Tank 38
2	MOV_0453.mp4	August 2, 2022 9:40 am		Emissions from vent of Tank 39
3	MOV_0454.mp4	August 2, 2022 9:42 am		Trailing vapors from Tank 39
4	MOV_0455.mp4	August 2, 2022 9:47 am		Emissions from vent of Tank 39
5	MOV_0456.mp4	August 2, 2022 9:49 am		Emissions from vent of Tank 43
6	MOV_0457.mp4	August 2, 2022 9:50 am		Emissions from vent of Tank 43
7	MOV_0458.mp4	August 2, 2022 9:52 am		Emissions from unknown tank
8	MOV_0459.mp4	August 2, 2022 10:01 am		Emissions from vents of east side of Tank 7
9	MOV_0460.mp4	August 2, 2022 10:04 am		Tank 3 and view towards neighboring property
10	MOV_0461.mp4	August 2, 2022 10:06 am		Emissions from vents of west side of Tank 7